U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Ocean Service
Office of Response and Restoration
Coastal Protection and Restoration Division
c/o EPA Region X (ECL-117)
1200 Sixth Avenue
Seattle, Washington 98101

August 24, 2006

Sean Sheldrake
U.S. Environmental Protection Agency Region 10 (ECL 111)
1200 6th Avenue
Seattle, WA 98101

Dear Sean:

This letter provides **NOAA's comments on the *Design Analysis Report (Conceptual 30 Percent Design Deliverable), Terminal 4 Early Action, Port of Portland, Portland, Oregon* and associated documents** prepared Anchor Environmental, L.L.C. for the Port of Portland and ated August 2006. Comments submitted herein are limited primarily to the Design Analysis Report (DAR), though some of these comments are also likely to be relevant to specific sections of other associated documents, in particular the draft *Biological Assessment*. NOAA is generally pleased with the 30 Percent DAR. However, we do have a few comments.

General Comments

Vertical Datums – NOAA recommends that the vertical datums referenced in the Terminal 4 (T4) 30% design and used for design and planning should be consistent between this removal action and the Portland Harbor Superfund Site. The vertical datum NGVD29 is referenced in numerous figures, including those associated with the design approach and dredge plan (Section 3) regarding depth of contamination (DOC). (For example, figures 1-3 reference NGVD29.) Figures 5-6 (PEC Neatline Elevation; Native Contact Neatline Elevation) are presented in CRD (Columbia River Datum). NOAA recommends that a consistent vertical datum be applied for evaluating all historic and current engineering and design work relating to sediment surface elevations, depth of sediment and dredging, filling, and capping activities. Furthermore, NOAA suggests that the North American Vertical Datum of 1988 (NAVD88) is appropriate for this effort based on the most recent bathymetry performed by DEA. In addition, sources for bathymetric and surface elevations (source data or grid/contour surfaces) should be clearly presented as appropriate (i.e., on figures with a vertical spatial component).

Specific Comments

Section 2.7 – Sediment Quality Objectives

The Port proposes to use Probable Effects Concentrations (PECs) in the delineation and design components of the removal action. NOAA agrees with EPA that, in the absence of harbor-wide sediment quality guidelines, Threshold Effects Concentrations (TECs) would be more appropriate for delineating and designing this removal action. This more conservative approach will help ensure that the Port's removal action will achieve suitable sediment quality standards that comply with the Portland Harbor RI/FS and EPA Record of Decision and, thus, minimize the potential need for future work at the T4 site.

Section 6.1.1.1 – Short-Term Water Quality Criteria

The third full paragraph states that *"Based on the results of the contaminant testing mobility on Terminal 4 sediments, turbidity will serve as a reliable surrogate for water quality conditions during dredging, capping, CDF filling, and other activities. By controlling releases of turbidity during construction, releases of sediment-associated contaminants will also be controlled. Should TSS monitoring exceed the applicable standards noted above, then a tiered approach to monitoring that includes chemical analyses compared to acute criteria will be implemented."* NOAA does not consider the application of models and TSS monitoring as a surrogate for water quality monitoring to be a suitable or acceptable approach. NOAA recommends sampling and chemical analyses of surface water to directly monitor water quality for chronic and acute exceedances of contaminants.

Section 6.6 Water Quality During Placement in the CDF

"The USACE model SETTLE will be used to simulate and predict water quality of elutriate leaving the CDF. The model will use the results from the MET and CST and the anticipated dredging equipment to predict effluent quality." NOAA recommends that water quality of elutriate leaving the CDF, should that scenario come to pass, be measured directly to determine, with a high degree of certainty, the extent to which this discharge may present a risk to ecological receptors.

Section 12 – Institutional Controls

Please note that navigational charts are maintained by NOAA, not the U.S. Coast Guard. Hence, the inclusion of "no anchor" zones, sediment caps and the like on navigational charts should be coordinated with NOAA.

Pg. 15, 2.2.4.1 Construction Methods, Second paragraph, second sentence: *"This structure will consist of a pipe and outlet areas at the surface of the water through which clean surface water will be skimmed as material is placed into the CDF..."* How will we know that this surface water is "clean"? (Please see previous comments.)

With respect to the biological assessment and in-water work schedules, please note that NOAA Fisheries does not support in-water in the lower Willamette River during ODFW's winter work window, unless the work is fully contained behind the CDF berm. Densities of

juvenile salmonids are high during the winter, and the potential for significant take is too great.

NOAA appreciates the opportunity to provide these comments. Please let me know if you have any questions.

Sincerely,

Robert Neely
NOAA Coastal Resource Coordinator

cc: Alyce Fritz, NOAA / NOS / CPRD (by email)
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